

IN THE DISTRICT COURT OF THE VIRGIN ISLANDS

DIVISION OF ST. THOMAS AND ST. JOHN

IN RE THE COMPLAINT AND PETITION)	3:21-cv-0059
OF COSTAR SAILING, LLC, AS OWNER,)	Third-Party Plaintiffs
AND J&J YACHT SERVICES, LLC, AS)	Demand
OWNER PRO HAC VICE/OPERATOR, OF)	Trial by Jury
THE S/V CARPE AURA, HULL #:)	
FPA54253I819 AND OFFICIAL NO.)	
1291579)	
)	
)	
EDWARD AND CINDY MOREA)	
)	
Claimants and Third-Party)	
Plaintiffs)	
)	
-against-)	
)	
ATLANTIC CRUISING YACHTS, LLC)	
FOUNTAIN PAJOT, SA and)	
CONSTANTINE BAKAS)	

Third-Party Defendants

NOTICE OF DEPOSITON OF THIRD-PARTY DEFENDANT
ATLANTIC CRUISING YACHTS, LLC REPRESENTATIVE

TO: Email: jmercante@rubinfiorella.com
MStern@RubinFiorella.com
James E. Mercante, Esq.
Michael Stern, Esq.
630 Third Ave, 3rd Floor
New York, NY 10017

Court Reporter
VERITEXT Legal Solutions
330 Old Country Road Suite 300
Mineola, NY 11501
516-608-2400
www.veritext.com

In Re J&J Yacht Services, et al. Civil No. 3:21-CV-0059

Notice of Deposition of Third-Party Defendant Atlantic Cruising Yachts, LLC

Page | 2

PLEASE TAKE NOTICE that pursuant to Federal Rules of Civil Procedure 26, 30 and 32, **Claimants/Third-Party Plaintiffs, Edward and Cindy Morea**, by and through undersigned counsel, will take the oral examination of **ATLANTIC CRUISING YACHTS, LLC representative, on September 7, 2023, at 9:30 a.m., at the Regus, 1910 Towne Centre Boulevard, Suite 250, Annapolis, MD 21401 and via Zoom conference pursuant to this Zoom address and IP link:**

<https://proceedings.veritext.com/?token=959d3940d5c6b99a6f2c0bbc16745819>

This deposition will be taken by stenographic means and pursuant to the rules cited above. The deposition may be recorded by video and/or audio means, including Zoom recording.

This deposition is being taken for use as evidence and/or trial purposes and may be continued from day to day until completed.

RESPECTFULLY SUBMITTED
Tabak Mellusi & Shisha LLP

DATED: September 1, 2023
Admitted Pro Hac Vice:

BY: /s/ Jacob Shisha
Jacob Shisha, Esq.
Ralph J. Mellusi, Esq.
Tabak Mellusi & Shisha LLP
29 Broadway
New York, NY 10006
Tel (212) 962-1590
Fax(212) 385-0920
Email: jshisha@sealawyers.com
Email: rjmellusi@sealawyers.com

LAW OFFICES OF K.G. CAMERON
Of Counsel Attorney for Claimants

DATED: September 1, 2023

BY: /s/ K. Glenda Cameron
K. Glenda Cameron, Esq.

In Re J&J Yacht Services, et al. Civil No. 3:21-CV-0059

Notice of Deposition of Third-Party Defendant Atlantic Cruising Yachts, LLC

Page | 3

VI Bar No. 683
Physical: No. 29 A King Cross Street
Mailing: 2157 King Cross Street, No. 1
Christiansted, St. Croix
U.S. Virgin Islands 00820
Telephone: (340) 773-3444
Email: kglenda@cameronlawvi.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following counsel:

Andrew C. Simpson, Esq.
Andrew C. Simpson, P.C.
2191 Church St., Ste 5
Christiansted, VI 00820

Email: asimpson@coralbrief.com

Ravinder S. Nagi, Esq.
V.I. Bar No. 1034
BOLTNAGI PC
Merchants Financial Center
4608 Tutu Park Mall, Suite 202
St. Thomas, VI 00802-1816
(340) 774-2944 Telephone
(340) 776-1639 Facsimile

Email: rnagi@vilaw.com

Attorneys for Third-Party Defendant Fountaine Pajot, SA

C. Jacob Gower, Esq. (R2103)
GOWER LEGAL LLC
1919 Pine Street
New Orleans, LA 70118

Email: jacob@gowerlegal.com

Attorney to Third-Party Defendant Dr. Constantine Bakas

LAW OFFICES OF DUENSING & CASNER

Matthew J. Duensing, Esq. - VI Bar No. 64
Joseph D. Sauerwein, Esq. - VI Bar No. R2030
Robin P. Seila, Esq.- VI Bar No. R2043
9800 Buccaneer Mall, Bldg. 2, Suite 9
P.O. Box 6785
St. Thomas, U.S.V.I. 00804 Tel: (340) 774-6011
Fax: (340) 776-8520

Email: mduensing@vilawyers.com

Email: jsauerwein@vilawyers.com

Email: rseila@vilawyers.com

and

In Re J&J Yacht Services, et al. Civil No. 3:21-CV-0059

Notice of Deposition of Third-Party Defendant Atlantic Cruising Yachts, LLC

Page | 4

RUBIN, FIORELLA, FRIEDMAN & MERCANTE

James E. Mercante, Esq. Michael Stern, Esq.

Email: jmercante@rubinfoiarella.com

630 Third Ave, 3rd Floor

New York, NY 10017

Tel.: (212) 953-2381

Attorneys for Third-Party Defendant Atlantic Cruising Yachts, LLC (“ACY”)

/s/ K. Glenda Cameron